

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

INQUISIENT INC., a Delaware
Corporation

Plaintiff,

v.

SERVICENOW, INC., a Delaware
Corporation,

Defendant.

C.A. No. 22-cv-900-CJB

**JOINT MOTION FOR TELECONFERENCE TO
RESOLVE PROTECTIVE ORDER DISPUTE**

InQusient, Inc. and ServiceNow, Inc. respectfully move this Court to schedule a teleconference to address outstanding disputes regarding the following protective order matters:

- Whether XML is Source Code;
- Whether “data definitions that define or describe software” should be excluded from Source Code;
- Whether “CONFIDENTIAL” or “HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY” material may be disclosed to two designated officers, directors, or employees of a receiving party regardless of involvement in competitive decision-making;
- Whether “CONFIDENTIAL” or “HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY” material may be disclosed to designated in-house counsel of a receiving party;
- The definition of the field of technology to which the prosecution and development bar applies;
- Where source code should be made available for inspection.

The following attorneys, including at least one Delaware Counsel and at least one Lead Counsel per party, participated in verbal meet-and-confers by telephone on the following date(s): January 23, 2023, February 3, 8, 10, and 14 2023, as well as by follow up email correspondence.

Delaware Counsel:

- ServiceNow, Inc.: Jennifer Ying (#5550)

- InQuisient, Inc.: Susan E. Morrison (#4690)

Lead Counsel:

- ServiceNow, Inc.: Jodie Cheng, John McKee, Chunmeng Yang, Gavin Frisch, Emily Alvarez-Bryant
- InQuisient, Inc.: Jason W. Wolff, Andrew Pearson, Adil Shaikh, Laura Powell

February 14, 2023

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/s/ Susan E. Morrison

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